



October 6, 2022

Colorado Department of Education  
Ms. Elizabeth Cordial  
Director of State Board Relations  
1025 Ninth Ave.  
Greeley, CO 80631

RE: Amendments to Proposed Regulations on Educator License Endorsements

Dear Ms. Cordial:

On behalf of the American Speech-Language-Hearing Association, I write to support school audiology and speech-language pathology endorsements with amended language.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 4,200 ASHA members reside in Colorado.<sup>1</sup>

In Section 7.08(2)(d), School Speech-Language Pathologist (Ages Birth-21), ASHA recommends amending the existing language to define the use of the term normal (such as within normal range or typical developmental reading and writing skills):

Identify traits of normal reading and writing development in the context of the general education curriculum.

In Section 7.08(4), ASHA recommends amending the existing language as follows:

The school speech-language pathologist is knowledgeable about **evidenced based and best practice** techniques, procedures and tools for intervention and remediation of communication disorders, including augmentative/alternative/assistive technology...

Current terminology used by practitioners does not use the term “state of the art” but does use evidence based and best practice.

In Section 7.01(2)(e), School Audiologist, ASHA recommends amending the existing language as follows:

**manage the selection, care and maintenance of the audiologic equipment, including oversight and scheduling of calibration**

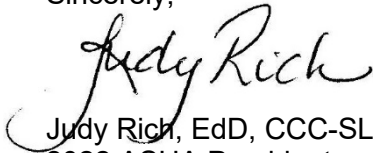
Audiologists rarely perform calibration procedures but provide management of these services provided by an external vendor.

For Section 7.01 below, while ASHA maintains that the requirement of an internship is preferable, ASHA is concerned that this requirement may prevent qualified candidates from applying for these positions and exacerbate the school shortages that already exist.

“7.01 School Audiologist (Ages Birth-21) To be endorsed as a school audiologist, an applicant must hold an earned master’s or higher degree from an accepted institution of higher education or, for candidates who graduate after 2007, hold a clinical doctorate from an accepted institution of higher education; have successfully completed an approved program in audiology; have successfully completed a practicum or internship in a school setting equivalent to a minimum of eight weeks, full-time, under the supervision of a professionally licensed or masters-level licensed audiologist; and have passed an approved national audiology exam.”

Thank you for considering ASHA’s recommendations to amend the proposed educator licensing endorsements. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,

A handwritten signature in black ink that reads "Judy Rich". The signature is written in a cursive, flowing style.

Judy Rich, EdD, CCC-SLP, BCS-CL  
2022 ASHA President

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<sup>1</sup>American Speech-Language-Hearing Association. (2021). *Colorado* [Quick Facts].  
<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/colorado-state-flyer.pdf>